

ZMO LAW PLLC

January 28, 2021

Via ECF and email

Hon. Loretta Preska
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

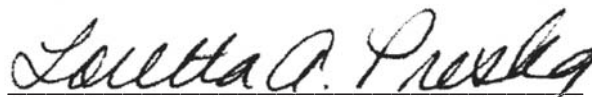
The extension requested below is approved.

SO ORDERED.

Dated: January 28, 2021
New York, New York

Re: *U.S. v. Jamie Rosario*, 19 Cr. 807

Dear Judge Preska:



LORETTA A. PRESKA, U.S.D.J.

This office represents Jamie Rosario in the above-captioned case. Defense pretrial motions are currently due tomorrow, January 29, 2021. We write, on consent, to request a two-week extension permitting us to file motions no later than February 12, 2021.

We had previously been advised by the government we received all discovery in this case. In an abundance of caution, my office emailed AUSA Daniel Nessim today to confirm that the government was not in possession of or planning to offer into evidence any post-arrest statements by Mr. Rosario's co-defendants. AUSA Nessim informed us today, for the first time, that there were, in fact, post-arrest statements by co-defendant Jeanluc Joiles that had not yet been produced.

As these statements may be relevant to a motion to sever pursuant to *Bruton*, and we have not yet received these statements made by Mr. Joiles, we are requesting an additional two weeks to file defense motions.

Our office has communicated with Mr. Nessim and he advises that the government consents to this request.

Thank you for your attention to this case.

Very truly yours,



Zachary Margulis-Ohnuma

CC: AUSA Daniel Nessim (via ECF and email)